Keefe B. ClemonsRegulatory Counsel

Legal Department Room 1403 185 Franklin Street Boston, MA 02110-1585

August 10, 2001

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: D.T.E. 00-54 – Sprint's Petition for Arbitration

Dear Ms. Cottrell:

The D.T.E. has before it as an issue that has not been resolved by Verizon Massachusetts and Sprint in connection with their new interconnection agreement, the appropriate language to be included in the agreement with regard to reciprocal compensation. To assist in resolving this issue, Verizon Massachusetts wishes to offer revised language defining the terms "Reciprocal Compensation Traffic" and "Measured Internet Traffic." The changes to Verizon Massachusetts' previously proposed language are shown in the accompanying attachment by underlining for additions and strikethrough for deletion.

The revised language is identical to language that recently has been submitted by Verizon in interconnection agreement arbitrations with Sprint in Maryland and Pennsylvania. The revisions are intended to more clearly define the traffic that is subject to reciprocal compensation by stating that traffic that does not originate and terminate within the same Verizon local calling area is not eligible for reciprocal compensation. A provision to the same effect is contained in Sprint's proposed definition of "Telecommunications Traffic."

Very truly yours,

/s/Keefe B. Clemons

Keefe B. Clemons

cc: Joan Foster Evans, Esquire, Hearing Officer
Michael Isenberg, Esquire, Director - Telecommunications Division
Cathy Thurston, Esquire
Craig D. Dingwall, Esquire